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FEDERAL BUREAU OF INVESTIGATION
OFFICE OF THE SECRETARY

January 28, 1993

Ms. Donna R. Searcy
Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Re: In the Matter of Amendment to Section 73.202(b)
MM Docket No. 92-202
RM-8051
Table of Allotments, FM Broadcast Stations
(Newberry Springs, California)

Dear Ms. Searcy:

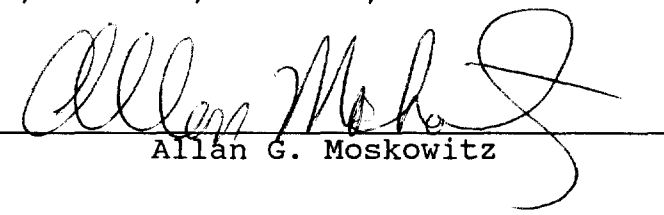
On behalf of Henry Broadcasting Company, licensee of
Radio Station KHTX(FM), San Bernardino, California, we are filing
herewith an original and four copies of its "Late Filed Comments"
with respect to the above-captioned proceeding.

Should any questions arise with respect to this matter,
please contact the undersigned counsel.

Respectfully submitted,

KAYE, SCHOLER, FIERMAN, HAYS & HANDLER

By


Allan G. Moskowitz

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BEFORE THE
Federal Communications Commission
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JAN 28 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)	
Amendment of Section 73.202(b))	MM DOCKET NO. 92-202
Table of Allotments)	RM-8051
FM Broadcast Stations)	
(Newberry Springs, California))	

To: Chief, Allocations Branch

LATE FILED COMMENTS

Henry Broadcasting Company ("Henry"), licensee of Radio Station KHTX(FM), Riverside, California ("KHTX"), by its attorney and pursuant to Section 1.415(d) of the Commission's Rules and a concurrently filed "Motion to Accept Late Filed Comments" hereby submits Comments requesting that the channel proposed to be allotted to Newberry Springs, California (Channel 247A) be changed instead to Channel 279A in order to allow KHTX to relocate its transmitter site.¹ In support thereof, the following is respectfully shown:

1. On July 20, 1992, Hills Broadcasting ("Hills") filed a Petition for Rulemaking requesting the allotment of Channel 247A to Newberry Springs, California. The engineering study included Hills' technical statement reflected that while the required spacing to first adjacent channel KHTX, Riverside, California, operating on Channel 248B, is 113 km, the reference coordinates

¹ On January 25, 1993, KHTX filed an application to relocate its transmitter site (File No. BPH-930125__). The application, as filed, is short-spaced to the reference coordinates proposed for Channel 247A at Newberry Springs, California, but would be fully spaced to the allotment of Channel 279A at Newberry Springs.

selected were 112.58 km, which allowed rounding to 113 km pursuant to the Rules.

2. On September 3, 1992, the Commission released a Notice of Proposed Rulemaking, DA 92-1139, in the above-referenced docket, proposing to allot Channel 247A to Newberry Springs, California. However, the Commission noted that its review of the proposal revealed that Channel 247A could only be allotted to Newberry Springs, California in compliance with Section 73.207 of the Commission's Rules with a site restriction 2.5 km north of Newberry Springs. At Footnote 3 the Commission explains that "The site restriction is required to avoid the short-spacing to the licensed site for Station KHTX(FM), Channel 248B, Riverside, California. . . ."

3. However, the allotment of Newberry Springs on Channel 247A at those coordinates would foreclose the possibility that KHTX could relocate its site to the north and it is in the public interest that KHTX move north. Attached hereto is the Technical Statement of Joe Sanford Mauk, Director of Engineering for Henry. As Mr. Mauk indicates, the present KHTX site was selected in 1947 and the population growth has extended the metropolitan area north into the San Bernardino Mountain Range and beyond. While this area is presently within the protected contour of the existing KHTX transmitter site, KHTX's signal is subject to severe degradation due to the extreme terrain shadowing caused by the mountains. Reception conditions in the areas north of the San Bernardino mountains are characterized by severe multipath distortion and noise.

4. As explained in its concurrently filed "Motion to Accept Late-Filed Comments," the instant Comments are filed as a last resort. KHTX first tried to locate a site which would improve its signal problems that would be fully spaced to the Newberry Springs allotment; tried to find a site that would allow use of contour protection with respect to the allotment; and then studied the possibility of changing the reference coordinates, all to no avail. Since none of these techniques were successful, KHTX requests a change in the channel for the allotment in order to resolve the conflict with KHTX's application. The proposed KHTX transmitter site will reduce the severe multipath conditions by providing improved line of site into the cities of Victorville, Adelanto, Hesperia, and Apple Valley on the north side of the San Bernardino Mountains and Redlands, Calimesa, Beaumont and Loma Linda on the south side of the mountains.

5. Moreover, the proposed transmitter site will almost eliminate KHTX's longstanding, grandfathered short-spacing to Radio Station KSON(FM), operating on Channel 247B at San Diego, California. Pursuant to Section 73.207 of the Commission's Rules, the required spacing between the two stations is 169 km, while the present spacing is only 139.6 km. The location of the proposed KHTX transmitter site will permit the spacing to KSON to be increased to 168.1 km. Consequently, the existing spacing deficiency between the two stations would be reduced from 29.4 km to a spacing deficiency of only .9 km: almost full spacing.

6. Additionally, review of the FCC data base reveals the existence of a Mexican government proposal to allot FM Channel 249B to Tijuana, Baja California Norte. As a result, the existing KHTX operation has been objected to by the Mexican government on February 28, 1992. The spacing from the proposed Mexican allotment at Tijuana on Channel 249B to the present KHTX transmitter site is 166.7 km, while the required spacing under the U.S./Mexican FM Agreement and Section 73.207(b)(3), Table C, is 170 km. The proposed KHTX transmitter site will increase the separation to 194.7 km and, therefore, resolve the conflict with the proposed Mexican allotment.

7. Finally, KHTX's proposed transmitter site will allow better operation of the Emergency Broadcast System ("EBS"). KHTX is, for EBS purposes, designated as the Common Program and Control Station (CPCS-1) for the Riverside/San Bernardino operational area and is, therefore, the primary entry point for activation of the EBS. However, due to the signal blockage caused by the San Bernardino Mountain Range and the unreliability of KHTX's signal in the area, stations in the northern areas of San Bernardino County currently monitor the CPCS station in Los Angeles and, therefore, do not receive local (i.e. county) EBS activations. Consequently, the proposed KHTX transmitter site will allow stations in the areas north of San Bernardino to monitor the local CPCS-1 and be able to rely on KHTX's signal for this purpose.

8. Therefore, in sum, KHTX proposes to relocate its transmitter site to eliminate shadowing and multipath distortion

of its signal; virtually eliminate a longstanding short-spacing of 29 km; resolve a conflict with the proposed Mexican allotment and facilitate the operation of the local EBS. However, in order to resolve the short-spacing between KHTX's proposed transmitter site and the proposed allotment of Channel 247A at Newberry Springs, KHTX requests that an alternative channel, 279A, be allotted to Newberry Springs.

9. Hill's selection of Channel 247A for Newberry Springs, California, is puzzling. Figures 4A and 4B to Mr. Mauk's statement are computerized printouts of the FM Data Base which reflect that there are a total of four other channels available at the U.S.G.S. coordinates for the community of Newberry Springs, all of which meet the separation requirements of Section 73.207. Furthermore, the results of a channel search at the reference coordinates reflect, at Exhibits 5A and 5B, that two other channels are available which meet the spacing requirements. Furthermore, Mr. Mauk documents that, utilizing Channel 247A, there does not appear to be any possibility of locating the transmitter site at a hill or mountain top location as specified in Section 73.315(b) of the Commission's Rules due to the site restriction to KHTX. In fact, there is no possibility of utilizing the contour protection of Section 73.215 in order to use a transmitter site on one of the mountains south of Newberry Springs. Consequently, in order to achieve maximum Class A facilities at the reference coordinates on Channel 247A, it would be necessary to construct a tower nearly 700 feet tall. Moreover, the reference coordinates are only 8 km from and in

line with the East/West runway of the Barstow-Daggett Airport and could be deemed an aeronautical hazard. As a result, Mr. Mauk concludes that Channel 247A is the "worst possible channel for allocation" to Newberry Springs.

10. Alternatively, of the channels available for allotment to Newberry Springs, it is clear, pursuant to Mr. Mauk's research, that Channel 279A is by far the best. Not only can Channel 279A be allotted at Newberry Springs in accordance with Section 73.207 at the reference coordinates with no site restriction, but the channel provides a large available site area. Furthermore, Channel 279 will allow for the use of maximum Class A facilities without requiring an extremely tall tower.

11. Existing Commission precedent and policy favors the consideration of alternative channels to resolve conflicts between rulemakings and pending applications, especially if sufficient public interest considerations favor the substitution of the alternate channel. In Conflicts Between Applications and Petitions to Amend the FM Table of Allotments, 7 FCC Rcd. 4917 (1992), the Commission adopted new procedures for resolving conflicts between pending FM applications and subsequently filed rulemaking petitions. The Commission noted that its existing policy is that when a subsequently filed rulemaking petition conflicts with a transmitter site proposed in an FM application, the Commission makes substantive choices based on several factors, including trying to restrict the site of the proposed allotment or the use of an alternative channel to eliminate the conflict. The Commission's new policy differentiates between

applications for new FM stations or for major changes and minor change and applications. At Paragraph 10, the Commission states that:

All other FM applications -- including all minor change applications . . . -- will be protected from conflicting rulemaking proposal on the date they are received at the Commission."18/

Footnote 18 states:

For purposes of this category, if a rulemaking petition is filed prior to or on the same date as a conflicting FM application, they will both be considered timely filed and treated under our existing substantive policy for resolving conflicts between applications and rulemaking petitions. 7 FCC Rcd. at 4919.

12. In the instant situation, Hill's Petition for Rulemaking was filed prior to KHTX's application for a minor change and, therefore, the Commission's existing policy for resolving conflicts between these two filings is applicable, i.e., the consideration of alternate channels. Further, the allotment of the alternate channel, 279A, would make more efficient use of the spectrum in that no site restriction would be necessary and the channel could more easily achieve maximum Class A facilities. Additionally, numerous public interest benefits will result from KHTX's proposal to relocate transmitter site. In the alternative, no one, including Hills, prospective applicants, and the community of Newberry Springs, would be prejudiced by the allotment of Channel 279A as an alternative to Channel 247A. However, KHTX would be foreclosed from relocating

its transmitter site to the north unless the alternative channel, 279A, is allotted to Newberry Springs instead of Channel 247A.

13. Moreover, the Commission has allotted alternate channels in order to resolve conflicts between conflicting proposals and applications. See, for example, Pinwood, South Carolina, 68 RR 2d 1124 (1990) and Grenada, Artesia and Ocolona, Mississippi, DA 91-1638, released January 7, 1992. See also Paragraph 3(c) to the Appendix to the NPRM. In fact, in the latter case the Commission determined sua sponte that the use of the alternative channel would resolve the conflict. Since it is the Commission's policy to presume that channels of the same class are equivalent for allotment purposes,² the use of Channel 279A at Newberry Springs in place of Channel 247A, especially in light of the above circumstances, should not be objected to.

14. In conclusion, KHTX respectfully requests that the Commission allot Channel 279A to Newberry Springs, California in place of Channel 247A in order to resolve the conflict with the application of KHTX to relocate site. KHTX's site relocation will allow it to reduce severe multipath within its protected coverage area; reduce an existing longstanding short-spacing; eliminate a short-spacing to a proposed Mexican allocation; and (4) improve the operation of the EBS system in the area. Moreover, the allotment of Channel 279A at Newberry Springs will allow potential applicants more flexibility in selecting a transmitter site without restrictions and allow the use of

² FM Channel Assignments, 67 RR 2d 606 (1990).

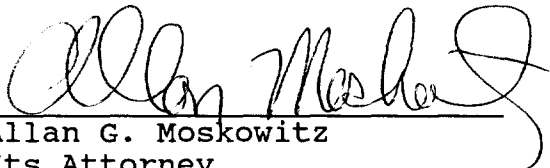
maximum Class A facilities without the need to construct a tall tower near an airport.

15. WHEREFORE, Henry Broadcasting Company respectfully requests that the Commission allot Channel 279A to Newberry Springs, California.

Respectfully submitted,

HENRY BROADCASTING COMPANY

By:


Allan G. Moskowitz
Its Attorney

KAYE, SCHOLER, FIERMAN,
HAYS & HANDLER
901 15th Street, N.W.
Suite 1100
Washington, D.C. 20005
(202) 682-3501

January 28, 1993

TECHNICAL STATEMENT
IN SUPPORT OF COMMENTS
BY HENRY BROADCASTING CO.

This technical statement has been prepared on behalf of Henry Broadcasting Co., in support of comments regarding the proposed rulemaking to allot FM Channel 247A at Newberry Springs, California (RM-8051 / MM Docket 92-202). Henry Broadcasting states that the public interest, necessity and convenience will be served by allotting FM channel 279A to Newberry Springs, CA in place of FM Channel 247A.

Henry Broadcasting is the licensee of station KHTX(FM), Channel 248B, Riverside, California. Henry Broadcasting has filed a construction permit application that proposes to relocate its transmitter site. The proposed KHTX transmitter site will; (1) reduced an existing, long standing, short spacing; (2) eliminate a short spacing to a proposed Mexican allocation of FM Channel 249B at Tijuana, Baja California Norte; (3) Reduce severe multipath and terrain blockages within the KHTX protected coverage area and (4)

improve the operation of the Emergency Broadcast System in the Riverside-San Bernardino Operational Area. The allocation of FM Channel 279A at Newberry Springs will; (1) allow the channel to be allotted without a site restriction, which the allotment of channel 247A presently necessitates; (2) allow potential applicants more flexibility in selecting a transmitter site; (3) eliminate the need to construct a tall tower in the traffic patterns of an airport. The change in the proposed allotment also results in a more efficient use of spectrum by making the use of maximum Class A facilities practical.

KHTX PROPOSED SITE

The licensee has conducted a diligent study of electronic sites in the San Bernardino Mountain Range with the goal of finding a site that would meet the minimum separation requirement to the proposed Newberry Springs allotment and thus obviate the need to substitute a different channel at Newberry Springs, CA. The licensee attempted to utilize contour protection under the provisions of Section 73.215 and also studied the possibility of changing the geographic coordinate reference points of the allotment. None of these techniques were successful in resolving the short spacing to the proposed allotment at Newberry Springs, CA.

The proposed KHTX transmitter site was selected in accordance with

Section 73.315(b) of the Commission's Rules. It has been chosen to maximize coverage to the station's city of license while also placing a primary coverage contour over the largest population within the protected contour of a Class B station and still provide line of site to most areas. The elevation of the proposed site is 1,046 meters higher than the existing KHTX transmitter site and population within the immediate vicinity of the proposed site is greatly reduced. There are no residences within 2 kilometers of the proposed site while the existing site has a total of 478 residences within the same distance, based on an analysis of aerial photographs.

The present KHTX transmitter site was constructed at the dawn of FM broadcasting in 1947. At that time, the population in Riverside and San Bernardino Counties was concentrated in and around the cities of Riverside, San Bernardino and Colton. Population growth trends have extended the metropolitan area into the San Bernardino Mountain range and into the areas north of the San Bernardino Mountains. These areas now contain four incorporated cities. They are the cities of Victorville, Hesperia, Adelanto and Apple Valley. According to the 1990 U. S. Census, the population of these cities totaled 145,688 persons. According to an official with the County of San Bernardino, the population of the unincorporated county territory is estimated to be 35,000 persons. An eight lane freeway was constructed to accommodate the large number of motorists who commute through the mountains to work in the Riverside-San

Bernardino, Los Angeles and Orange County areas. This northern area is totally within the protected contour of the existing KHTX transmitter site, yet is subject to severe signal degradation due to the San Bernardino Mountain Range. The elevations in this mountain range average 5,000 to 6,000 feet. This causes extreme terrain shadowing of the signal in the area north of the San Bernardino Mountains. Reception conditions in this area are characterized with severe multipath distortion and noise. The proposed KHTX transmitter site will reduce the severe multipath conditions caused by the terrain shadowing in the northern portion of KHTX's protected coverage area by providing improved line of sight. Figures 1A through 1H show the improvement in line of sight between the existing and proposed KHTX transmitter sites into the cities of Victorville, Adelanto, Hesperia and Apple Valley on the north side of the San Bernardino Mountains; Redlands, Calimesa, Beaumont and Loma Linda on the south side of the San Bernardino Mountains.

At present, the KHTX licensed transmitter site does not meet the separation requirements to station KSON, FM Channel 247B, at San Diego, California. There is a long standing short spacing that has existed since the construction of the two radio stations and is grandfathered under Section 73.213 (a). The required spacing between the two stations, as specified in Section 73.207 of the Commission's Rules, is 169 kilometers. The present spacing between KHTX and KSON is 139.6 kilometers which represents a shortage of

29.4 kilometers. The location of the proposed KHTX transmitter site will permit the spacing to KSON to be increased to 168.1 kilometers. Figures 2A and 2B are a computerized tabulation of the separations at the present KHTX transmitter site and Figures 3A and 3B contain the same data for the proposed KHTX transmitter site. The data indicates the proposed relocation would greatly reduce the present separation shortage.

There is also a proposal that shows up in the FCC database that involves a Mexican Government proposal to allot FM channel 249B to Tijuana, Baja California Norte. This Mexican proposal has resulted in the existing KHTX operation being objected to by the Mexican Government on February 28, 1992. The spacing from the proposed Mexican allotment to the present KHTX transmitter site is 166.7 kilometers. Under the U.S. - Mexico FM agreement and Section 73.207 (b) (3) Table C, the required separation is 170 kilometers. The proposed KHTX transmitter site will increase the separation to 194.7 kilometers and would resolve the conflict with the Mexican allotment.

KHTX is, for Emergency Broadcasting System purposes, designated as the Common Program and Control Station (CPCS-1) for the Riverside-San Bernardino Operational Area. The CPCS-1 designation means that KHTX is the primary entry point for activation of the Emergency Broadcasting System for the Riverside-San Bernardino Operational area. It is difficult, at present, to receive KHTX in the

Victorville-Hesperia area due to the signal blockage to the north, caused by the San Bernardino Mountain Range. Many stations in the northern areas of San Bernardino County currently monitor the CPCS-1 station in Los Angeles because they are unable to receive a reliable signal from the Riverside-San Bernardino Operational Area CPCS-1 and therefore do not receive local (county and operational area) activations of the Emergency Broadcasting System. The proposed KHTX transmitter site will allow stations in the areas north of the San Bernardino Mountain range to monitor the designated CPCS-1 in their "home" operational area. This will allow life threatening emergency information to be disseminated to a larger segment of the public in a much shorter time due to the fact that federal, local and state emergency service organizations will not have to notify multiple radio stations during an activation of the Emergency Broadcasting System.

THE BENEFITS OF CHANNEL 279A

The proposed allotment of FM Channel 247A to Newberry Springs, Ca (RM-8051 / MM Docket 92-202) could be termed "the worst possible channel for allocation." Under Section 73.207 of the Commission's Rules, Channel 247A could not be allotted to the geographic coordinates contained in the U.S.G.S. Names Information System Population of Places database due to a separation shortage to KHTX, Riverside, California. Therefore it was proposed that a site restriction 2.5 kilometers north of Newberry Springs, California

be added to the proposed allotment. Henry Broadcasting commissioned a search of the entire FCC FM database for channels that were available for use at Newberry Springs, CA. Figure 4A and 4B are a computerized printout of the FCC FM Database search and it shows that there is a total of 4 other FM channels available at the U.S.G.S. coordinates for the community of Newberry Springs. All of these channels meet the separation requirements of Section 73.207. Henry Broadcasting conducted another search to examine the availability of channels at the reference coordinates contained in the rulemaking. The results of this search are shown in Figure 5A and 5B and reveal that a total of two other channels are available that meet the requirements of Section 73.207 at these coordinates. One is left to wonder what the motive was behind the selection of channel 247A. Clearly there are other channels available for allotment to Newberry Springs, CA that better serve the public's interest, necessity and convenience.

FM channel 279A is by far the most flexible channel for use at Newberry Springs, California. Figure 6 is a computerized tabulation of the separations for FM channel 279A at Newberry Springs. It can be moved up to 5.1 kilometers to the south, 19.1 kilometers to the east, 36.2 kilometers to the northeast, 29.0 kilometers to the southwest and 21.6 to the northwest. Figure 7 shows that there are no separation shortages to Mexican allotments based on Class B separation requirements in accordance with the Section 73.207 (b) (3) Table C. which will allow FM channel 279A to support a Class

A station operating with six kilowatts.

Figure 8 is a photo-reduction of a U.S.G.S 15 1/2 minute map with the site limitation plotted for the proposed FM channel 247A. This map demonstrates that there does not appear to be any possibility of locating the transmitter site at a hill or mountain top location, as specified in Section 73.315 (b) and still meet the provisions of Section 73.207 due to the site restriction to KHTX, Riverside. Henry Broadcasting investigated the possibilities of moving the proposed Newberry Springs allotment south to allow the use of a transmitter site on one of the mountains south of the community of Newberry Springs under the provisions of contour protection in Section 73.215. Figure 9 is a computer generated plot of the maximum facilities of the present KHTX protected contour, 54 dbu, F(50,50); calculated according to Section 73.215 (b) (2) (iv), and the proposed Newberry Springs allotment's maximum facilities interfering contour, 48 dbu, F(50,10); calculated according to Section 73.215 (b) (2) (i). Figure 10 is a computer generated plot of the maximum facilities of the present KHTX interfering contour, 54 dbu, F(50,10); and the proposed Newberry Springs allotment's maximum facilities protected contour, 60 dbu, F(50,50). It can be seen from these plots that there is already severe contour overlap occurring and that there is no possibility to utilize the contour protection provision of Section 73.215 of the Commission's Rules.

In order to achieve maximum Class A facilities at the present proposed coordinates, it would be necessary to construct a tower of 211.8 meters (695 feet) in order to operate the facility with 6 kilowatts at a height above average terrain of 100 meters. The geographic coordinates for the proposed Newberry Springs allotment is only 8 kilometers from, and in line with the east-west runway of, the Barstow-Daggett Airport and could constitute a hazard to the landing and takeoff patterns of the airport.

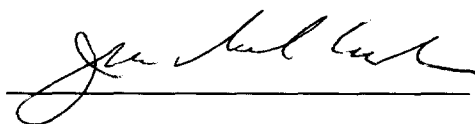
It is also obvious the proposed allocation of FM channel 247A will result in an inefficient use of spectrum because it is highly unlikely that a potential applicant could afford to construct such a tall tower and would in all probability choose to operate the station at less than maximum facilities.

Section 73.315(b) suggests that transmitter sites be located in sparsely populated areas at the highest elevation possible to maximize coverage area and minimize interference. The proposal to allot FM Channel 247A does not allow an applicant to meet either of those requirements.

The use of the substitute Channel 279A at the community of Newberry Springs will meet the requirement of Section 73.315(a) of the Commission's Rules for extending a 70 dbu (3.16 mV/m) contour over the "city of license".

This technical report which is part of comments to a rulemaking proceeding before the Federal Communications Commission has been prepared for Henry Broadcasting Co. Inc. All representations contained herein are true to the best of my knowledge. I am an experienced radio engineer whose qualifications are a matter of record with the Federal Communications Commission. I am an employee of the Henry Broadcasting Co., Inc. in the capacity of Director of Engineering.

Signed this 27st Day of January 1993

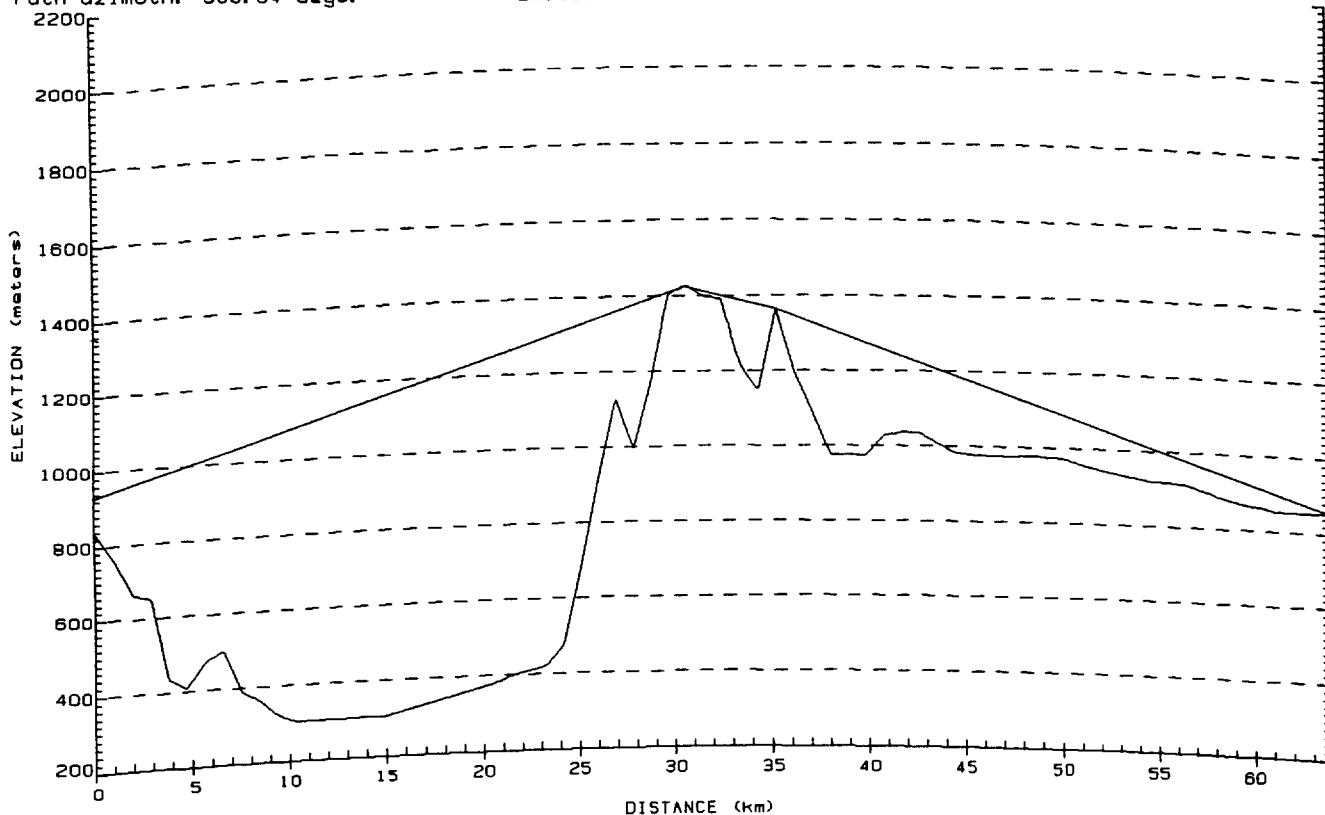
A handwritten signature in cursive script, appearing to read "Joe Sanford Mauk", is written over a horizontal line.

Joe Sanford Mauk

Site: EXISTING KHTX SITE
 N 33 57 57 W 117 17 21
 Ant. Elev. (AMSL): 929.0 m
 Path azimuth: 359.34 degs.

Frequency: 97.5 MHz
 Path Length: 63.7 km
 Total Path Loss: 135.1 dB
 Excess Path Loss: 26.8 dB

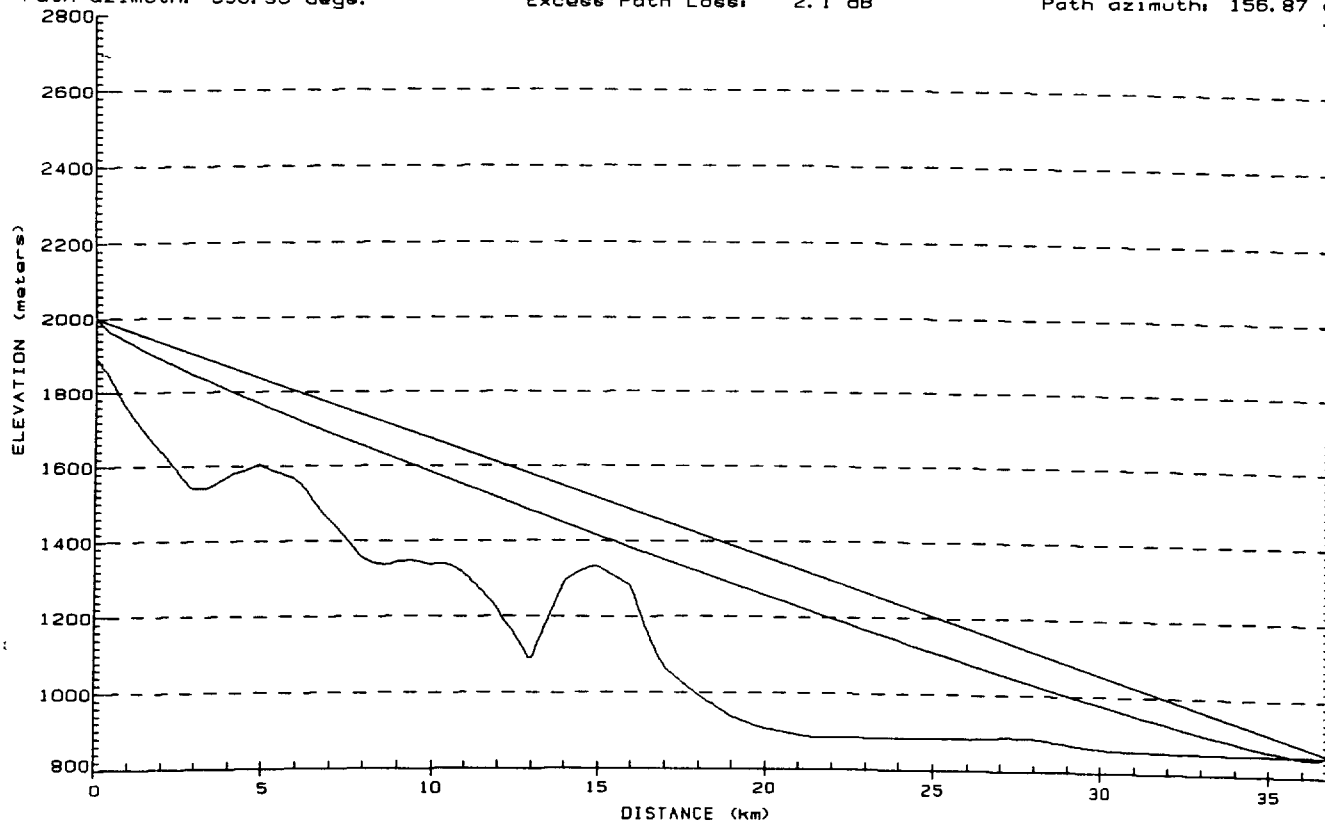
Site: VICTORVILLE, CA
 N 34 32 20 W 117 17 50
 Ant. Elev. (AMSL): 856.0 m
 Path azimuth: 179.33 degs.



Site: PROPOSED KHTX SITE
 N 34 14 4 W 117 8 24
 Ant. Elev. (AMSL): 1998.0 m
 Path azimuth: 336.96 degs.

Frequency: 97.5 MHz
 Path Length: 36.8 km
 Total Path Loss: 105.7 dB
 Excess Path Loss: 2.1 dB

Site: VICTORVILLE, CA
 N 34 32 20 W 117 17 50
 Ant. Elev. (AMSL): 856.0 m
 Path azimuth: 156.87 degs.

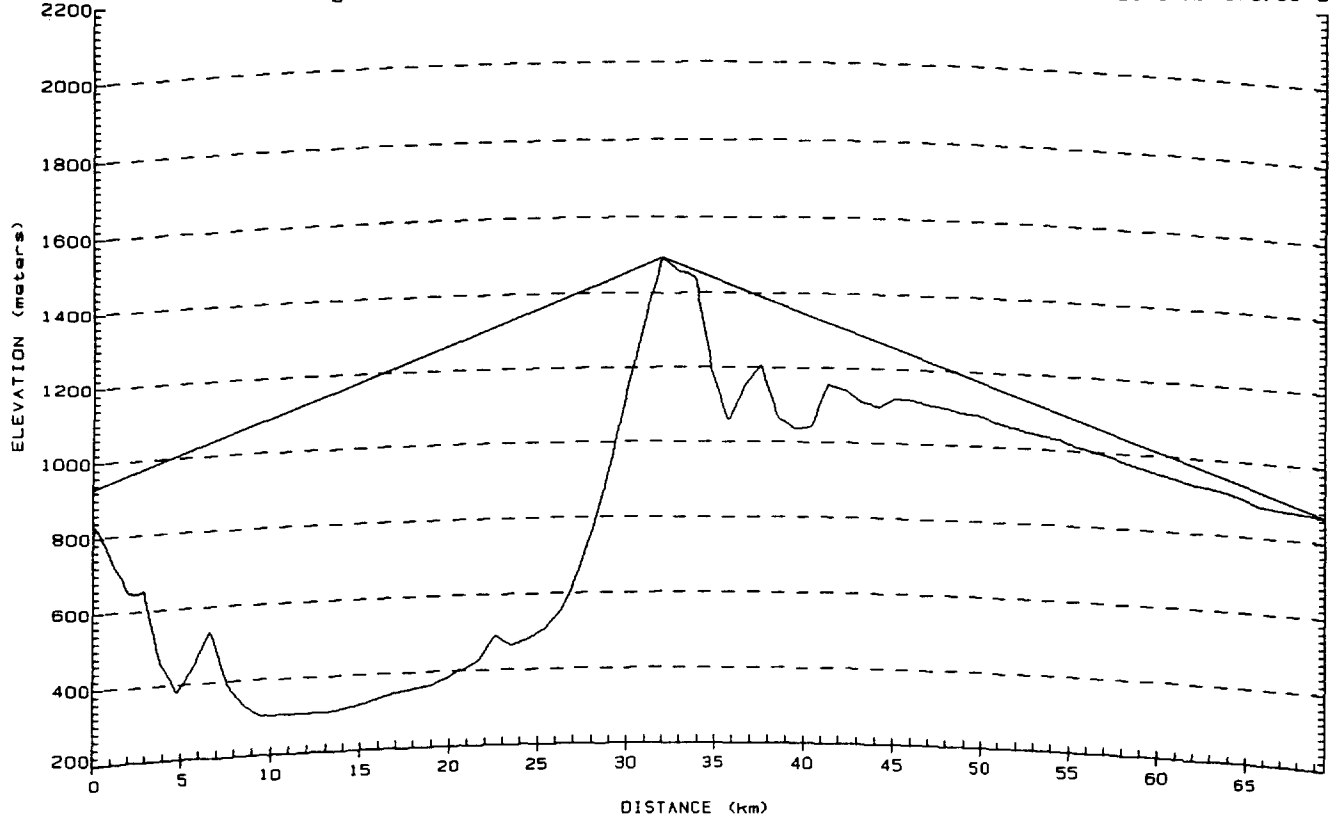


HENRY BROADCASTING CO.
 KHTX RADIO STATION
 FIGURE 1A

Site: EXISTING KHTX SITE
 N 33 57 57 W 117 17 21
 Ant. Elev. (AMSL): 929.0 m
 Path azimuth: 350.96 degs.

Frequency: 97.5 MHz
 Path Length: 69.5 km
 Total Path Loss: 134.1 dB
 Excess Path Loss: 25.0 dB

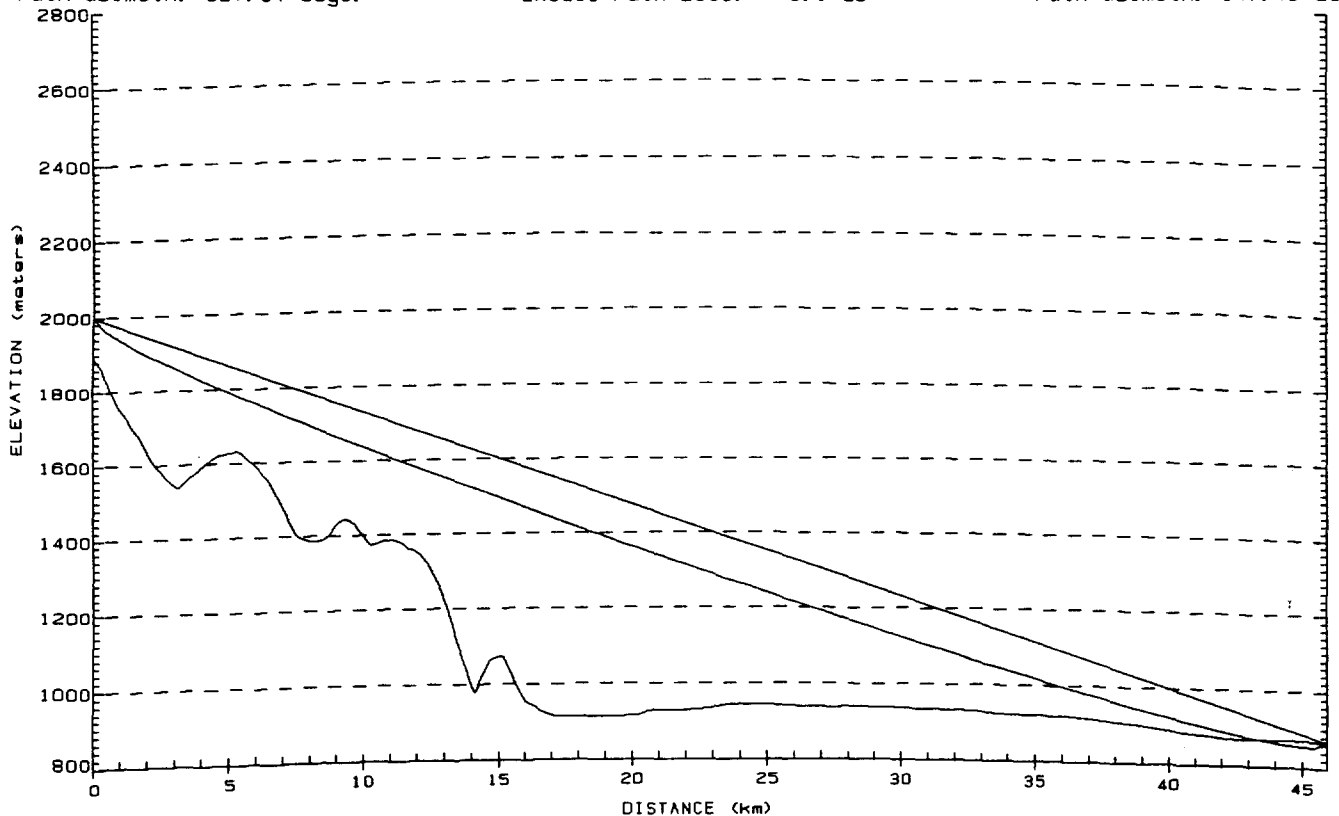
Site: ADELANTO, CA
 N 34 34 58 W 117 24 30
 Ant. Elev. (AMSL): 867.0 m
 Path azimuth: 170.90 degs.



Site: PROPOSED KHTX SITE
 N 34 14 4 W 117 8 24
 Ant. Elev. (AMSL): 1998.0 m
 Path azimuth: 327.64 degs.

Frequency: 97.5 MHz
 Path Length: 45.9 km
 Total Path Loss: 108.6 dB
 Excess Path Loss: 3.1 dB

Site: ADELANTO, CA
 N 34 34 58 W 117 24 30
 Ant. Elev. (AMSL): 867.5 m
 Path azimuth: 147.49 degs.

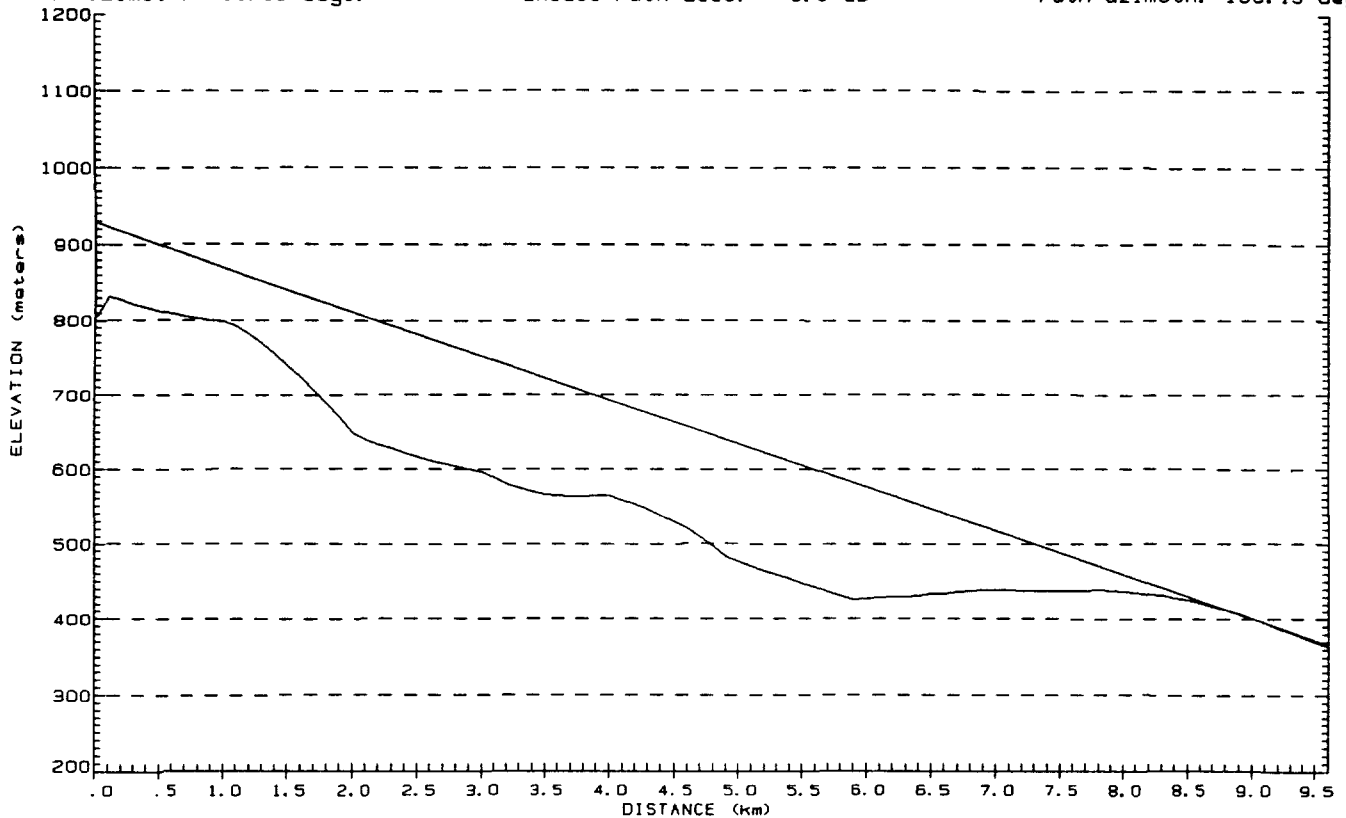


HENRY BROADCASTING CO.
 KHTX RADIO STATION
 FIGURE 1B

Site: EXISTING KHTX SITE
 N 33 57 57 W 117 17 21
 Ant. Elev. (AMSL): 929.0 m
 Path azimuth: 16.18 degs.

Frequency: 97.5 MHz
 Path Length: 9.6 km
 Total Path Loss: 101.4 dB
 Excess Path Loss: 9.5 dB

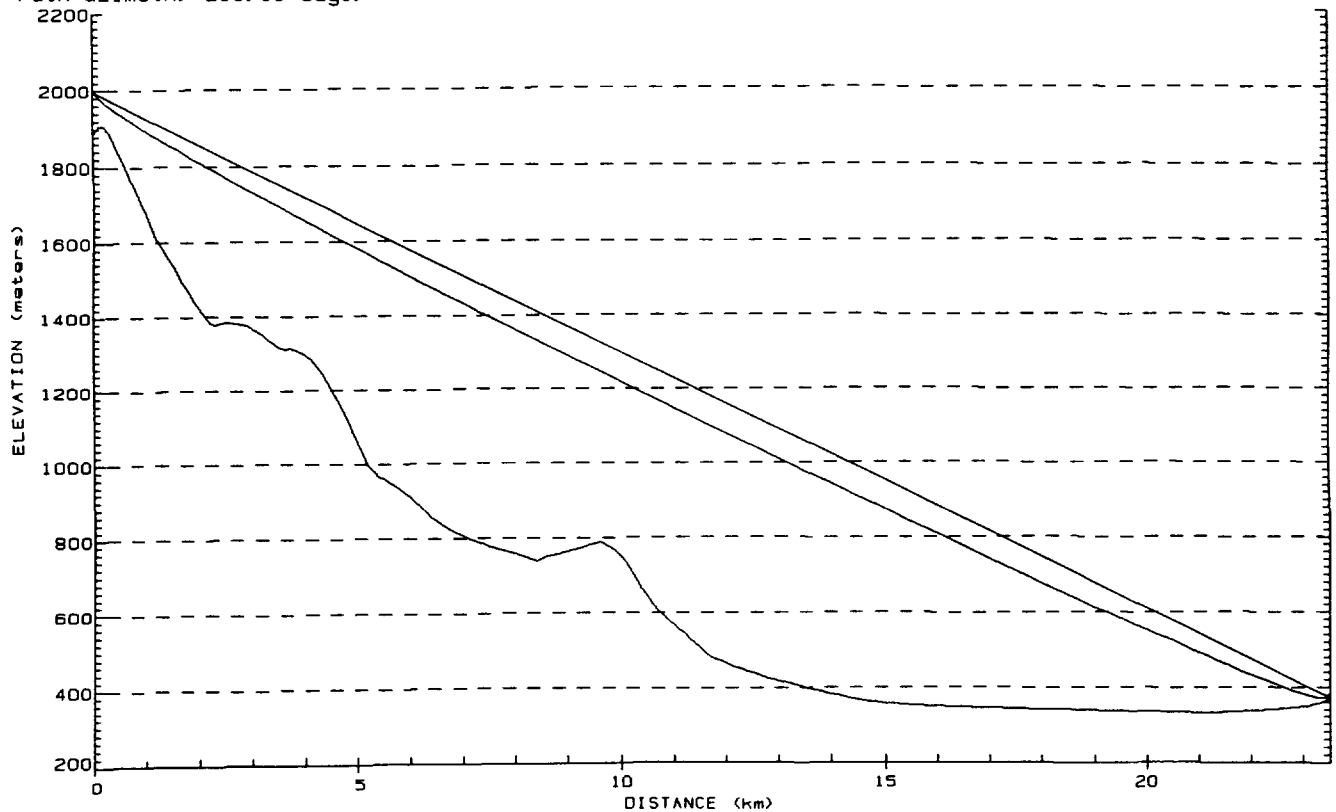
Site: LOMA LINDA, CA
 N 34 2 54 W 117 15 37
 Ant. Elev. (AMSL): 356.0 m
 Path azimuth: 196.19 degs.



Site: PROPOSED KHTX SITE
 N 34 14 4 W 117 8 24
 Ant. Elev. (AMSL): 1998.0 m
 Path azimuth: 208.18 degs.

Frequency: 97.5 MHz
 Path Length: 23.5 km
 Total Path Loss: 102.0 dB
 Excess Path Loss: 2.4 dB

Site: LOMA LINDA, CA
 N 34 2 54 W 117 15 37
 Ant. Elev. (AMSL): 371.5 m
 Path azimuth: 28.11 degs.

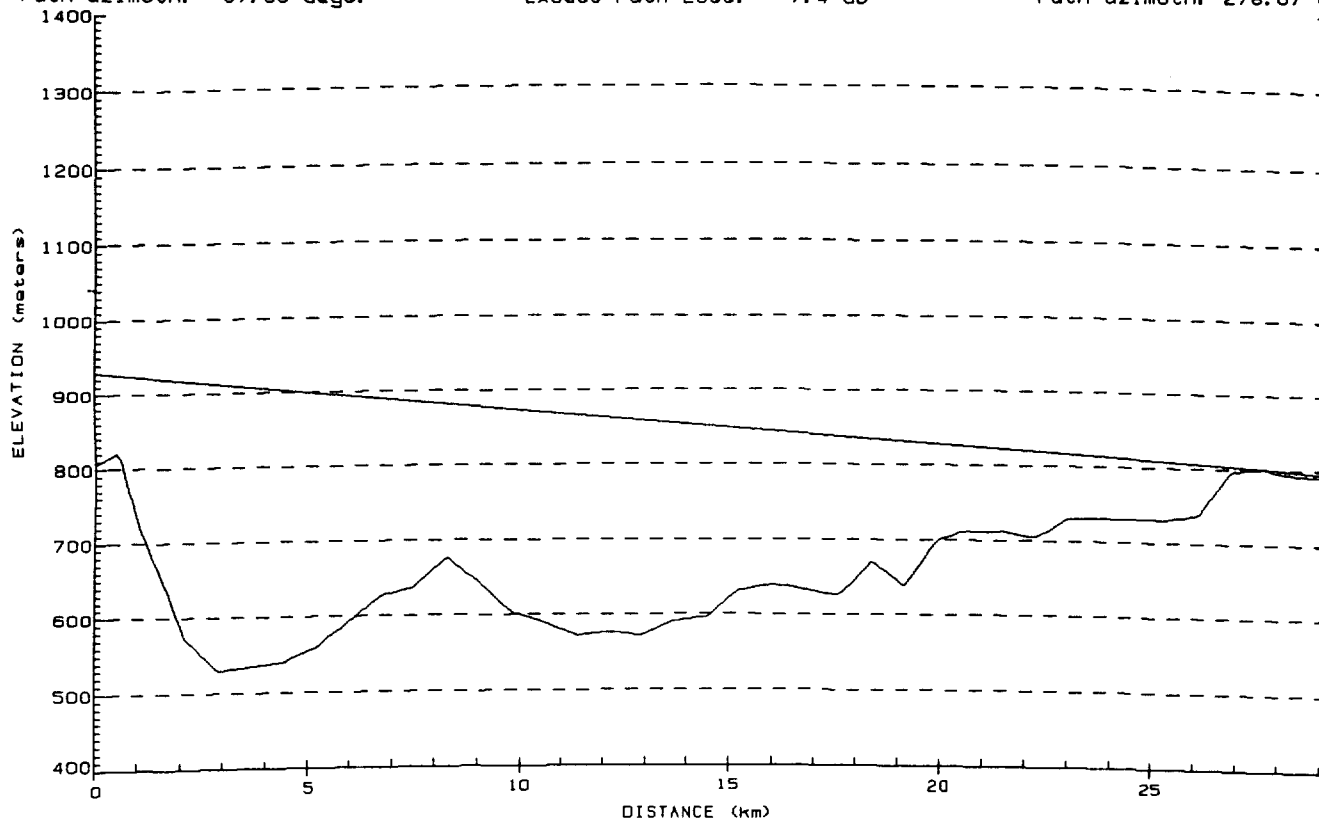


HENRY BROADCASTING CO.
 KHTX RADIO STATION
 FIGURE 1C

Site: EXISTING KHTX SITE
N 33 57 57 W 117 17 21
Ant. Elev. (AMSL): 929.0 m
Path azimuth: 97.90 degs.

Frequency: 97.5 MHz
Path Length: 29.2 km
Total Path Loss: 108.9 dB
Excess Path Loss: 7.4 dB

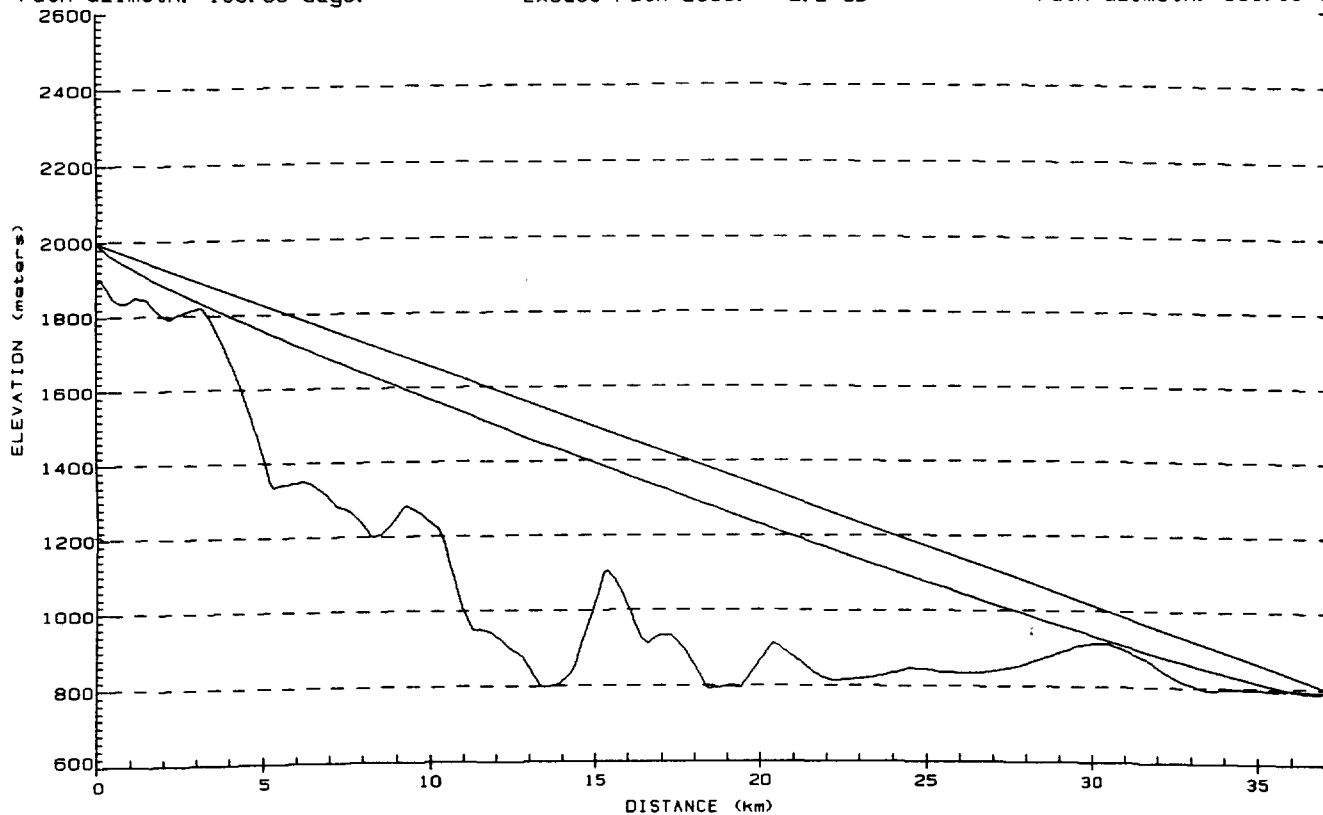
Site: BEAUMONT, CA
N 33 55 46 W 116 58 35
Ant. Elev. (AMSL): 794.5 m
Path azimuth: 278.07 degs.



Site: PROPOSED KHTX SITE
N 34 14 4 W 117 8 24
Ant. Elev. (AMSL): 1998.0 m
Path azimuth: 156.00 degs.

Frequency: 97.5 MHz
Path Length: 37.2 km
Total Path Loss: 105.8 dB
Excess Path Loss: 2.2 dB

Site: BEAUMONT, CA
N 33 55 46 W 116 58 35
Ant. Elev. (AMSL): 794.5 m
Path azimuth: 336.09 degs.

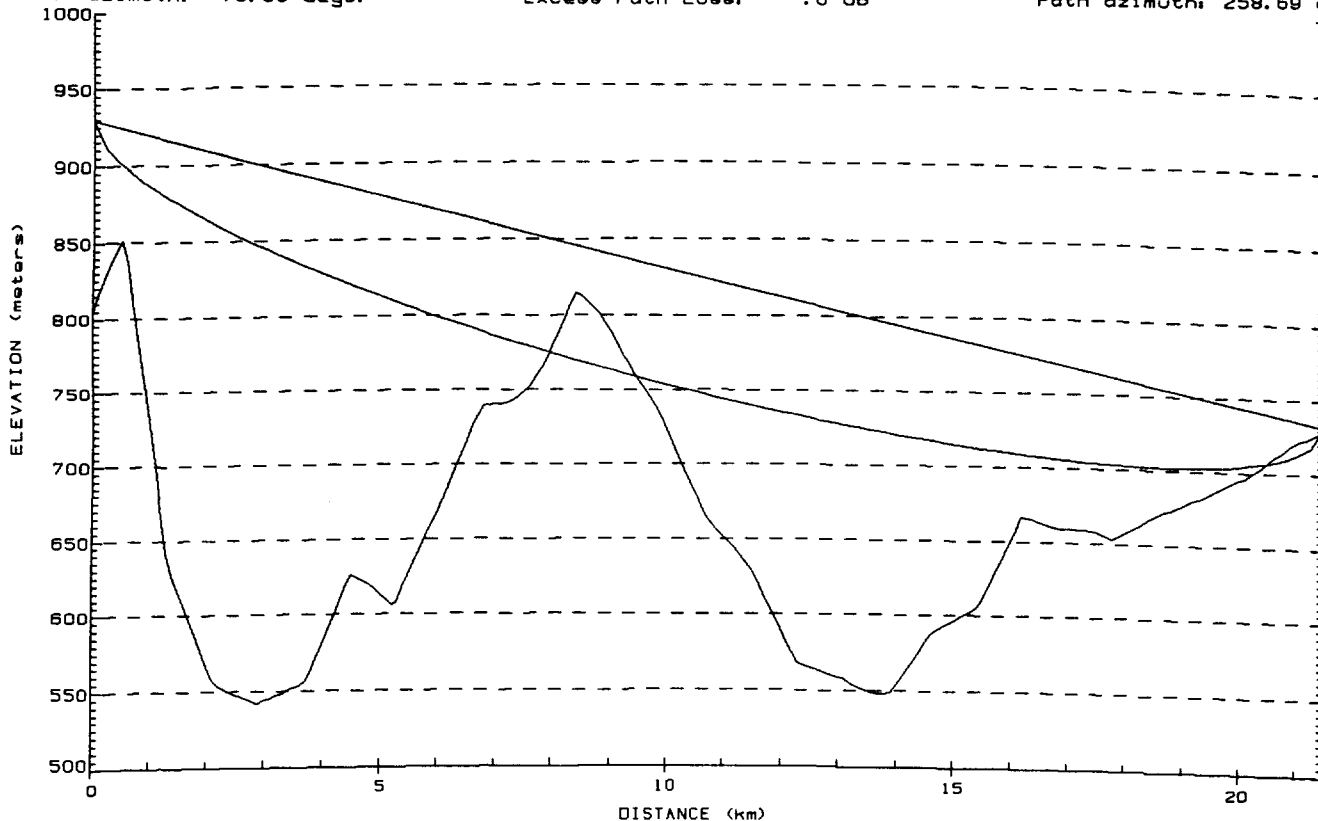


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Site: EXISTING KHTX SITE
 N 33 57 57 W 117 17 21
 Ant. Elev. (AMSL): 929.0 m
 Path azimuth: 78.56 degs.

Frequency: 97.5 MHz
 Path Length: 21.5 km
 Total Path Loss: 99.5 dB
 Excess Path Loss: .6 dB

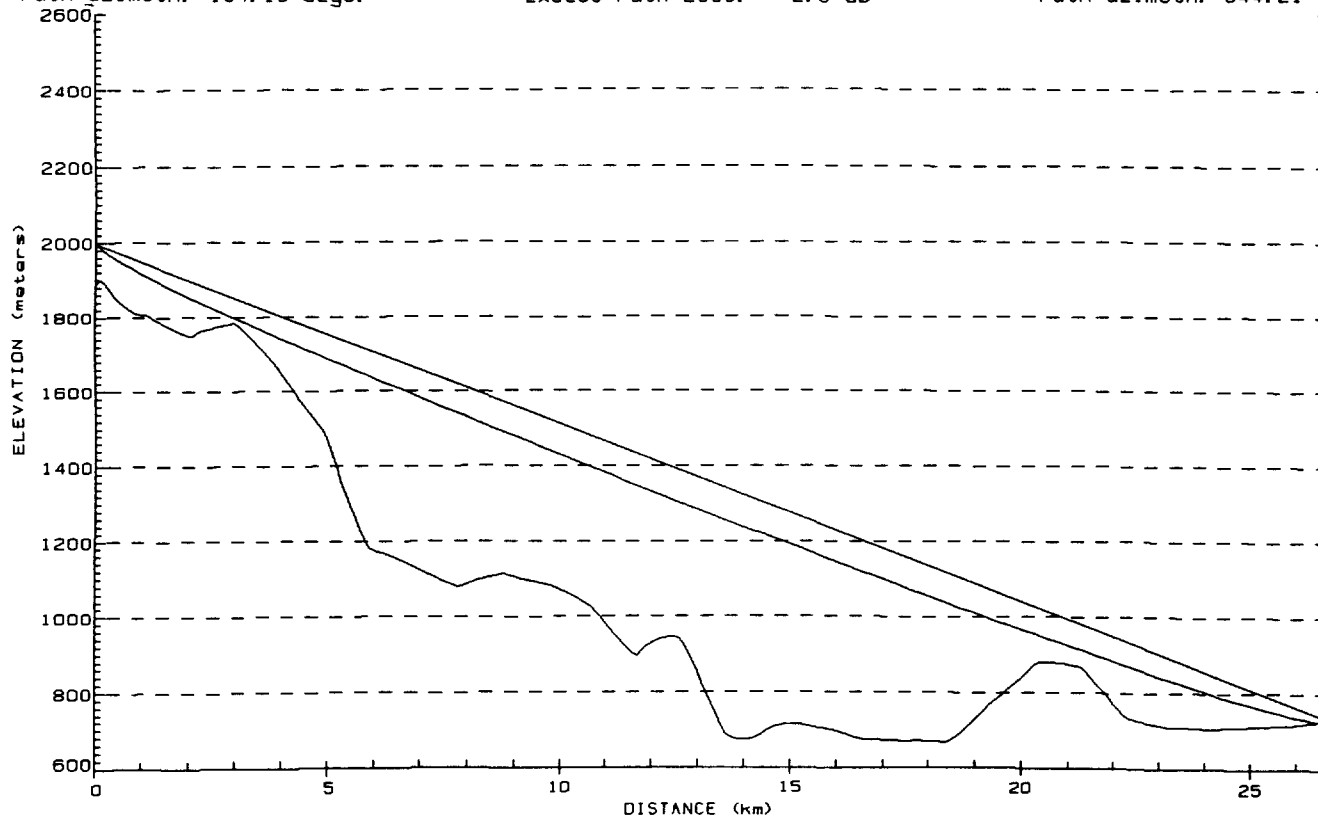
Site: CALIMESA, CA
 N 34 0 14 W 117 3 40
 Ant. Elev. (AMSL): 731.5 m
 Path azimuth: 258.69 degs.



Site: PROPOSED KHTX SITE
 N 34 14 4 W 117 8 24
 Ant. Elev. (AMSL): 1998.0 m
 Path azimuth: 164.16 degs.

Frequency: 97.5 MHz
 Path Length: 26.7 km
 Total Path Loss: 103.3 dB
 Excess Path Loss: 2.5 dB

Site: CALIMESA, CA
 N 34 0 14 W 117 3 40
 Ant. Elev. (AMSL): 731.5 m
 Path azimuth: 344.21 degs.



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 FIGURE 1E